must be increased to 1000 watts effective radiated power (ERP) in order for PCS to approach its full potential. 39/ The 100 watt EIRP limit on PCS base stations would dramatically and unnecessarily increase the number of PCS base stations required to meet the construction requirements and unnecessarily raise the cost of PCS to American consumers. Additionally, the difference in free space propagation loss at cellular frequencies and at PCS frequencies would put PCS at a 7 dB disadvantage. Limiting PCS base station power to 100 watts EIRP would place PCS at an additional eightfold coverage disadvantage relative to cellular's 500 watts ERP limitation. 40/

B. APC requested that the coordination distances specified in Table 2 of Section 99.233(a) and the power and antenna height limits of Section 99.231(a) be modified in concert with an increase in the PCS base station power limit. See also Northern Telecom Inc., pp. 17-21, and Time Warner Telecommunications, p. 13.

The following parties similarly requested an increase in the PCS base station power limit: Ameritech, pp. 1-2, MCI Telecommunications Corporation, pp. 7-8, Motorola, Inc., pp. 7-8, Northern Telecom Inc., pp. 6-21, Pacific Bell & Nevada Bell, pp. 3-4, PacTel Corporation, pp. 1-7, Sprint Corporation, pp. 14-15, Telocator, pp. 2-7, Time Warner Telecommunications, p. 13, and US West, Inc., pp. 2-16.

APC also demonstrated that increasing the PCS base station power limit to 1000 watts ERP would not undermine Commission Rules intended to control exposure to RF radiation, to protect microwave incumbents from harmful interference and to control service extensions into adjacent PCS markets.

- C. APC also requested that the position location accuracy requirement of Section 99.53(e) be modified to specify accuracy to the nearest second in latitude and longitude. This level of accuracy is sufficient for all relevant purposes, and a greater accuracy requirement would add expense without corresponding benefit. This proposal was mirrored by Telocator, p. 15, and supported by UTAM.
- D. APC supports the proposals of the Fixed Pointto-Point Communication Section of the Network Equipment
 Division of the Telecommunications Industry Association (TIA
 TR14.11) regarding PCS-OFS interference calculation
 procedures. Specifically, APC concurs with TIA TR14.11 that
 industry-developed interference calculation standards (as
 specified in Telecommunications Systems Bulletin No. 10-F
 "Interference Criteria for Microwave Systems in the Private
 Radio Services") will be adopted in early 1994 and that
 reliance on such standards should be encouraged.
 Additionally, APC concurs with the revisions to Appendix D
 proposed by TIA TR14.11.
- proposal for blanket licensing of PCS facilities (Section 99.11(b)). APC also supports a Telocator proposal to streamline the PCS filing process by instituting electronic filing procedures. APC is committed to assisting Telocator in the development of such procedures, which will greatly reduce

the Commission's administrative burdens and facilitate information retrieval by the general public.

- F. APC opposes the proposal of the Utilities
 Telecommunications Council (UTC) to adopt cellular licensing
 procedures for PCS applicants. As noted by APC in its
 November 24, 1993 Reply Comments in the auction rule making
 (PP Docket 93-253), imposing cellular filing requirements upon
 PCS applicants would be inappropriate and/or in direct
 conflict with the Part 99 rules already adopted.
- G. APC supports the changes to Section 99.234(a) proposed by Telocator. Specifically, these changes will apply PCS emission limitations within the PCS band and specify the resolution bandwidth used in determining compliance with them.
- H. APC supports Telocator's proposal to conform the language of Section 99.52 to the discussion in the Second Report and Order.

* * *

APC continues to regret the Commission's decision not to allocate at least a portion of the 38 GHz band specifically for PCS backhaul. As we feared, because of the Commission's failure in this regard, recent applications propose to consume all of the remaining 38 GHz channels in the Washington/Baltimore and other substantial markets.

Case-by-case adjudication of competing applications in the 38 GHz band in self-defined rectangular service areas is an inefficient, ineffective and delay-prone approach to the problem of congestion on these frequencies. APC urges the Commission to reconsider and adopt a partial set-aside of the 38 GHz frequencies for PCS backhaul.

> Respectfully submitted, AMERICAN PERSONAL COMMUNICATIONS

J. Barclay Jones Vice President, Engineering American Personal Communications Washington, D.C. 20036 (202) $\overline{2}96-0005$

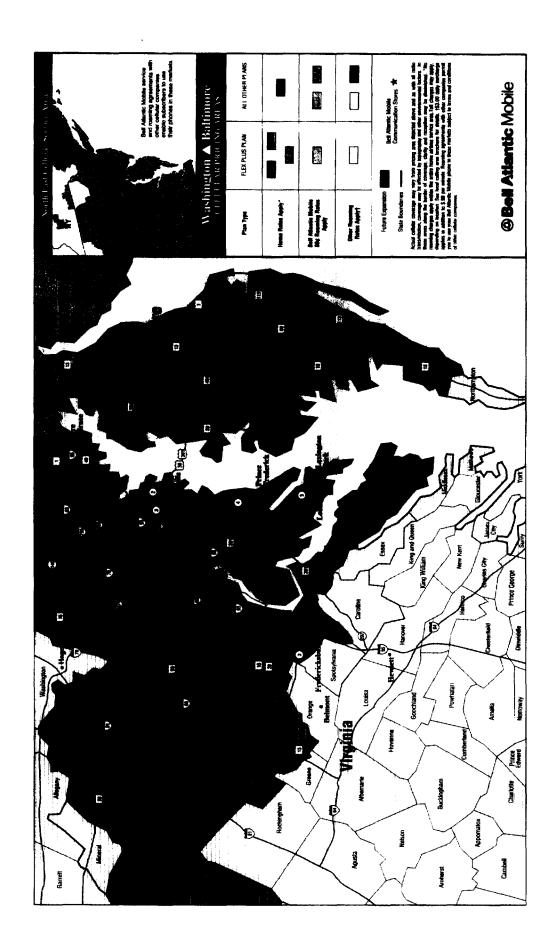
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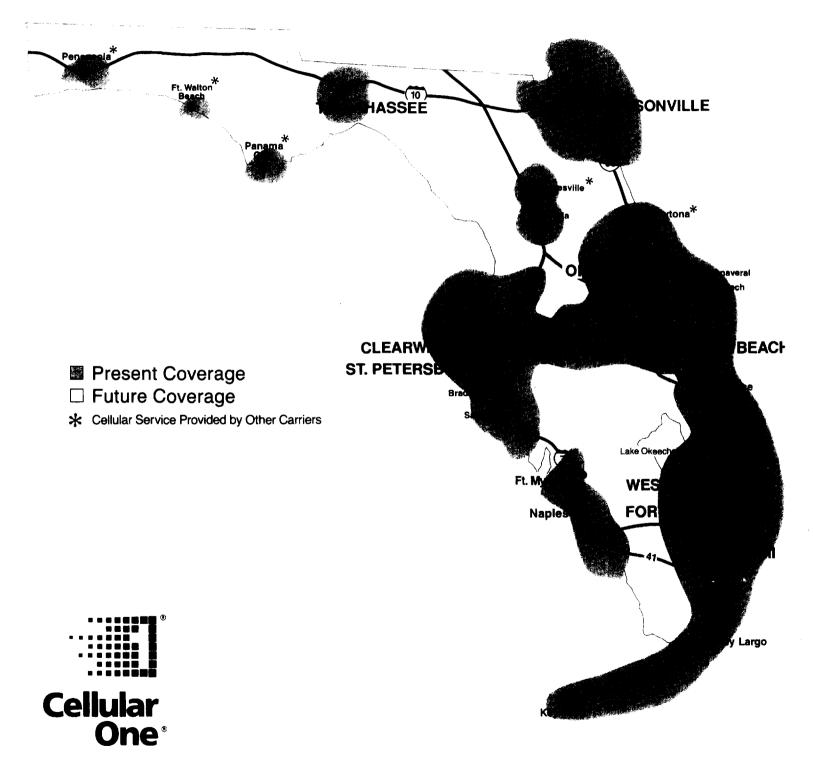
Kurt A. Wimmer

December 30, 1993



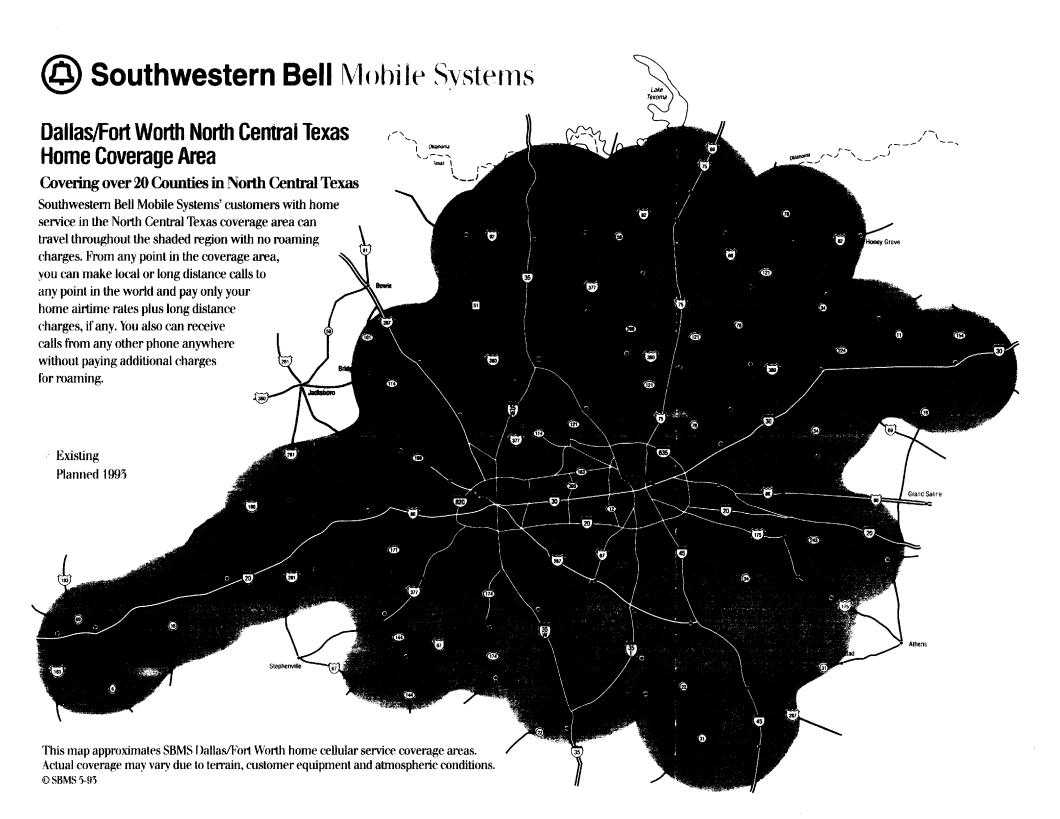


FLORIDA STATE COVERAGE MAP



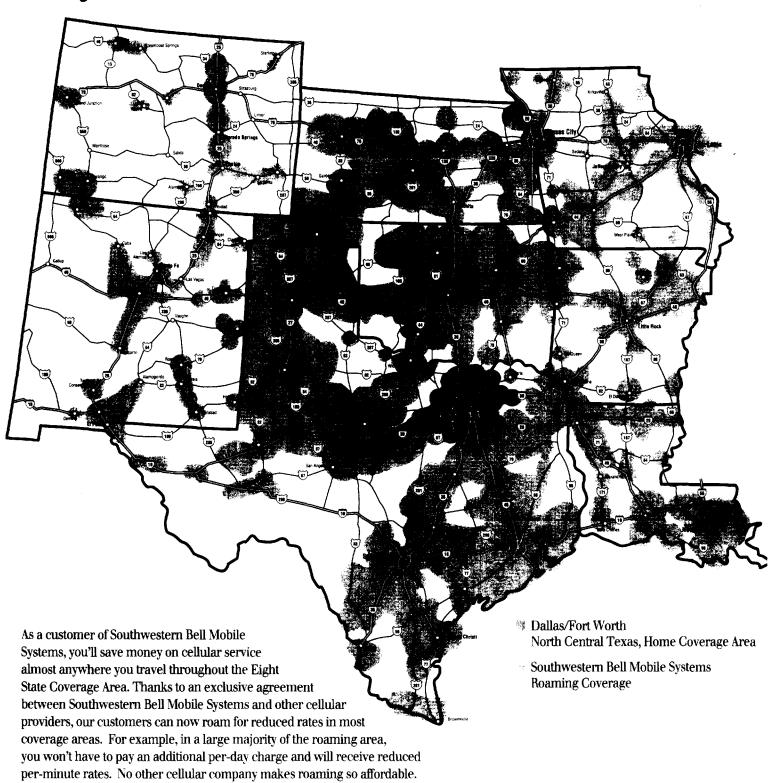
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Range and Coverage are estimated to be 90% of noted area. Factors such as topography, electronic interference, etc. may affect performance.

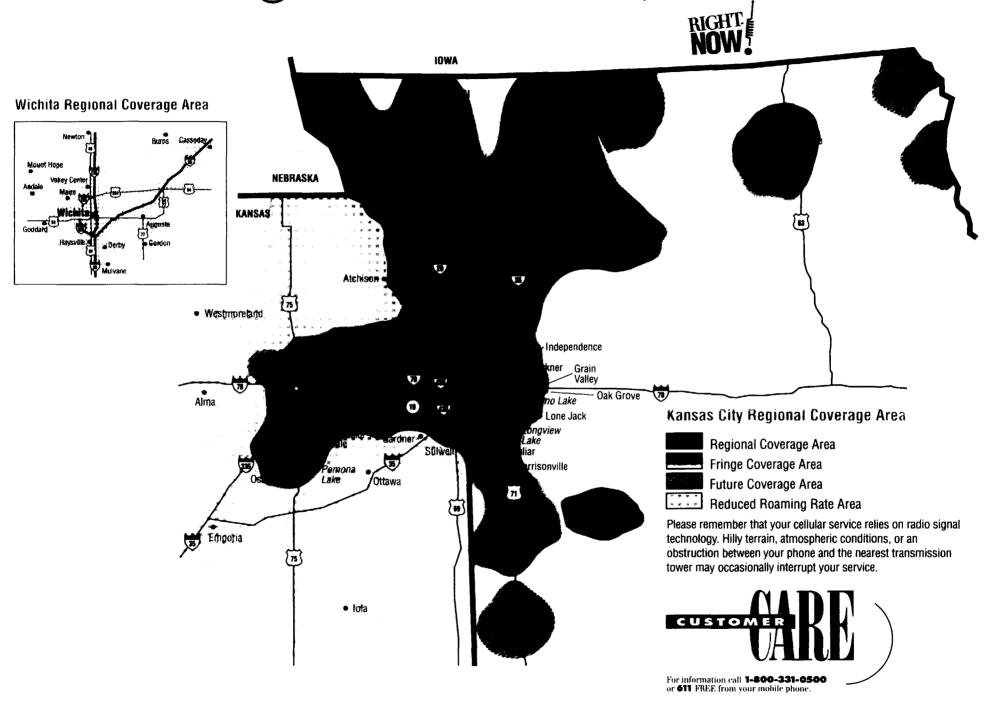


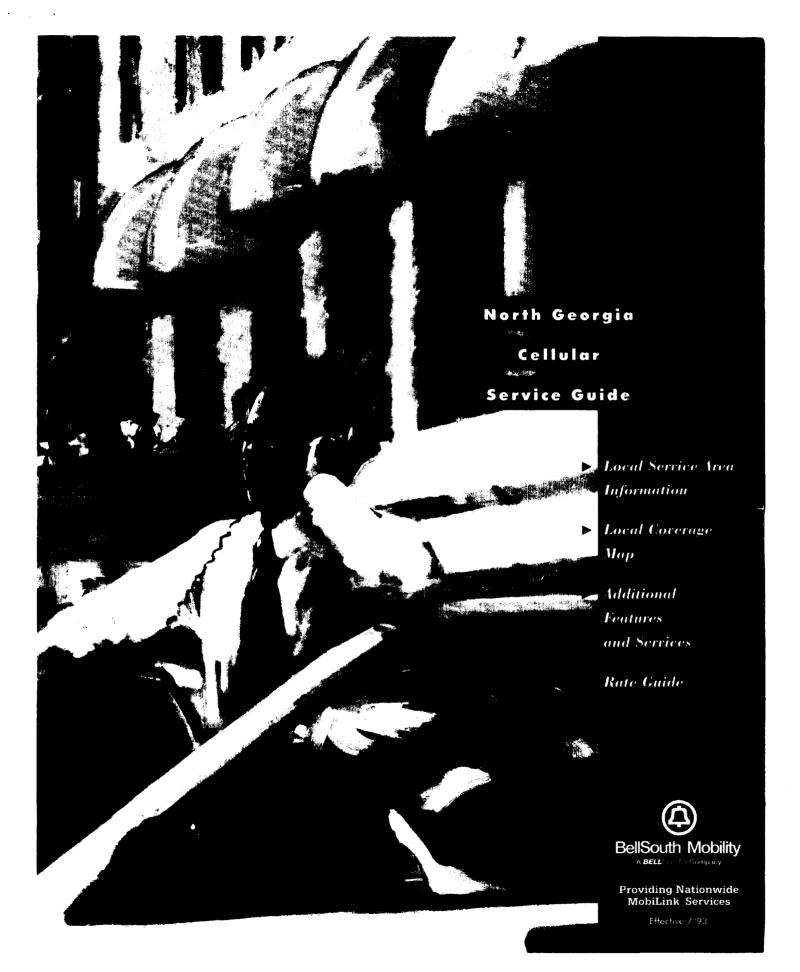
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Eight State Coverage Area



(2) Southwestern Bell Mobile Systems





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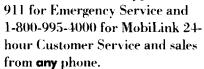
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- ► Mobile Memo® Voice Mail Service records messages for you when you're away or on the phone with another call and, with the message notification option, pages you when you receive a message.
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- ► The Signal Dial Direct® Plus cellular phone insurance, a low-cost way to guard your equipment against damage, loss, theft, mechanical and electrical failure.
- ► Cellular LinkSM lets you create a "mobile office" by connecting your phone to fax machines, modems and other interface equipment.

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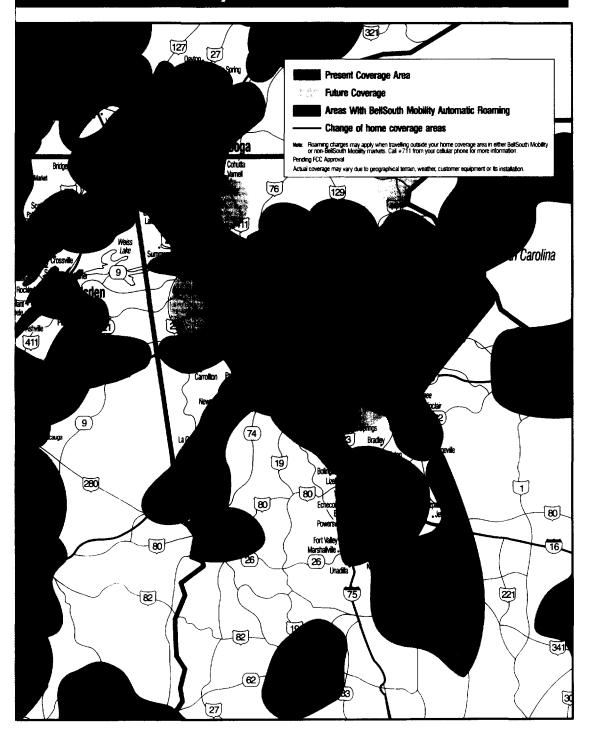
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